

Morgan Lewis

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September 26, 2016

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Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

**Re: WC Docket No. 16-143, WC Docket No. 15-247, WC Docket No. 05-25;
RM-10593,
Notice of Ex Parte Communication**

Dear Ms. Dortch:

On September 22, 2016, William Davis, Thomas Ferry, and Mary McDermott of Lumos Networks Corp. ("Lumos") along with Joshua M. Bobeck and the undersigned of Morgan Lewis, met with Paul De Sa, Chief of the Office of Strategic Planning and Policy Analysis, and Deena Shetler and Eric Ralph each with the Wireline Competition Bureau.

In addition to discussing points made in its prior submissions in these proceedings, Lumos explained in detail the obstacles benchmark pricing would create and how such regulation of Lumos' pricing would impede its ability to invest in its fiber network and continue bringing competitive fiber deployment to underserved and rural markets in parts of Virginia, West Virginia and other states. For example, Lumos highlighted how its customers typically do not seek individual circuits but rather require Lumos to provide complex solutions to their network needs, such as connecting numerous disparate campuses across Virginia into a single unified network despite the network crossing multiple price cap LEC and rate-of-return LEC boundaries. Further, Lumos discussed the challenges in deploying fiber solutions for health care and social services providers that need customized routing to ensure their networks remain resilient.

Lumos emphasized that it might not be able to afford to build such solutions if it had to comply with price benchmarks based on ILEC rates for point to point circuits that share few, if any, of the

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characteristics of the networks that Lumos deploys to serve customers. Lumos also provided the participants the attached presentation.

Please contact the undersigned with any questions regarding this filing.

Respectfully Submitted,

/s/ Eric J. Branfman

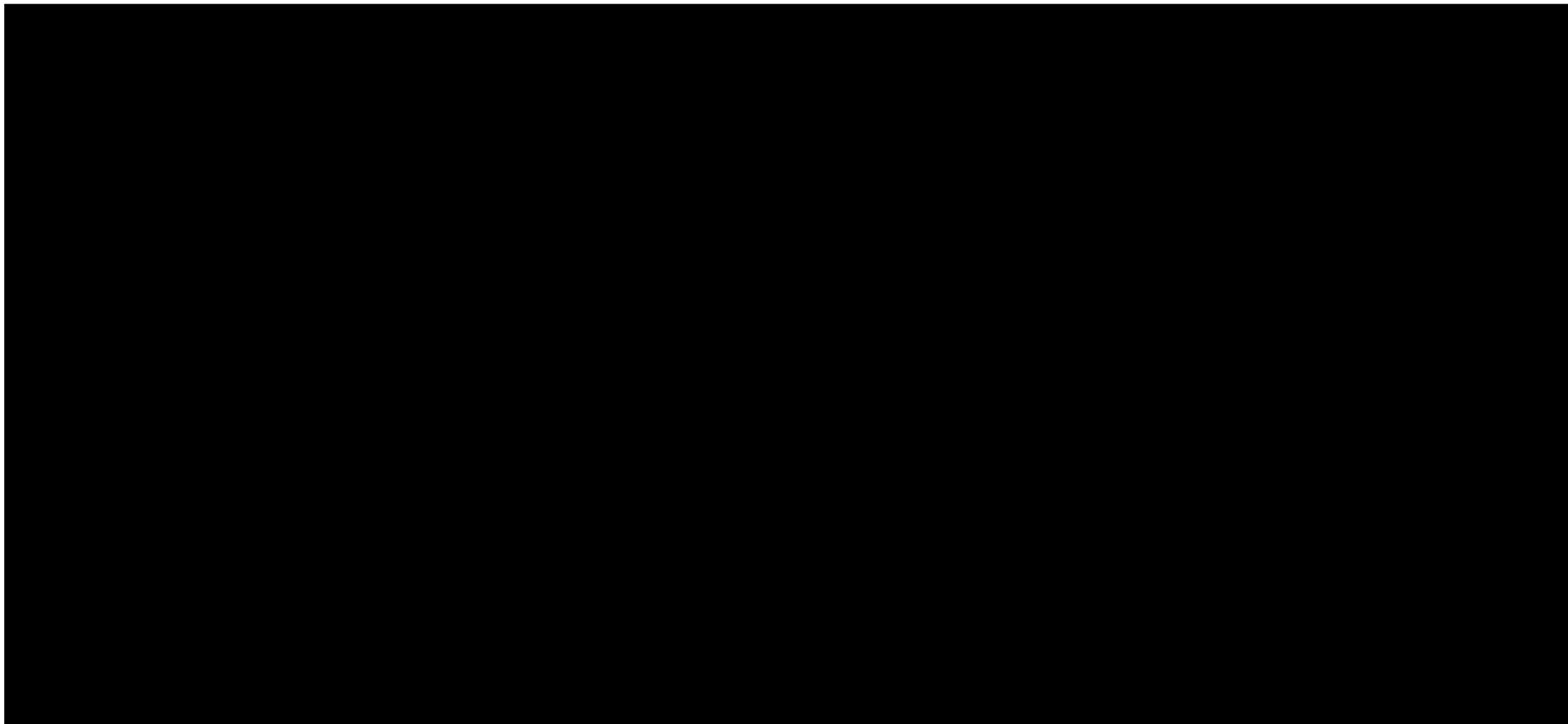
Eric J. Branfman
Joshua M. Bobeck

Counsel for Lumos Networks Corp.

Attachment

cc: (via email):

Paul De Sa
Deena Shetler
Eric Ralph



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| [REDACTED] | | |
|------------|-------------------|------------|
| Bandwidth | Count of Circuits | MRC \$ |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| TOTAL | [REDACTED] | [REDACTED] |

| [REDACTED] | | |
|------------|-------------------|------------|
| Bandwidth | Count of Circuits | MRC \$ |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| Total | [REDACTED] | [REDACTED] |

| [REDACTED] | | |
|------------|-------------------|------------|
| Bandwidth | Count of Circuits | MRC \$ |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED] | [REDACTED] |
| Total | [REDACTED] | [REDACTED] |

